

1 John A. Conkle (SB# 117849)
j.conkle@conklelaw.com
2 Amanda R. Washton (SB# 227541)
a.washton@conklelaw.com
3 Desiree J. Ho (SB# 313250)
d.ho@conklelaw.com
4 CONKLE, KREMER & ENGEL
Professional Law Corporation
5 3130 Wilshire Boulevard, Suite 500
Santa Monica, California 90403-2351
6 Phone: (310) 998-9100 • Fax: (310) 998-9109
7 Attorneys for Defendant Flying Food
Group, LLC
8

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11

12 MARIA RODAS, individually and on
behalf of other persons similarly
13 situated,

14 Plaintiff,

15 v.

16 Flying Food Group LLC, and DOES 1
through 10,

17 Defendant.
18

CASE No.

**DECLARATION OF LAURA
BLAND IN SUPPORT OF
DEFENDANT FLYING FOOD
GROUP, LLC'S NOTICE OF
REMOVAL**

Action Filed:
Trial Date:

November 30, 2018
None

DECLARATION OF LAURA BLAND

I, Laura Bland, hereby declare as follows:

1. I am currently employed by Flying Food Group, LLC in the position of Corporate Recruiting Manager. Before I became the Corporate Recruiting Manager, I held the position of Human Resources Manager for Flying Food Group, LLC. I have been employed by Flying Food Group, LLC since January 3, 2014. I make this declaration of facts known to me based upon my position and employment at Flying Food Group, LLC. If called upon, I could and would testify competently to the facts stated herein.

2. I am informed and believe that Flying Food Fare, Inc. wholly owns, and is the sole member of, Flying Food Group, LLC. I am informed and believe that Flying Food Fare, Inc. is a corporation headquartered and incorporated in the State of Illinois.

3. I am informed and believe that Flying Food Group, LLC is a limited liability company organized in the State of Delaware and headquartered in the State of Illinois.

4. I am informed and believe that Flying Food Group, LLC provides payroll services for five facilities in California, and that these facilities are located at: 1) 5807 West 98th Street in Los Angeles, 2) 6751 W. Imperial Highway in Los Angeles; 3) 3305 Bandini Blvd. in Vernon; 4) 810 Malcolm Road in Burlingame; and 5) 50 Adrian Court in Burlingame.

5. I am informed and believe that the average hourly rate for the five California facilities in 2017 was approximately \$15.21, and that approximately 673 employees were terminated in 2017 at the five California facilities.

7. I am informed and believe that, as of January 17, 2019, there are approximately 415 hourly nonexempt employees currently employed at the facility located at 3305 Bandini Blvd. in Vernon, California.

I declare under penalty of perjury under the laws of the State of California and United States of America that the foregoing facts are true and correct, and that this declaration was executed on January 18, 2019.

Laura Bland
Laura Bland